

Exhibit A

**From:** Gray, Kimberly B. - City Council <Kimberly.Gray@richmondgov.com>  
**To:** Jones, Michael J. - City Council <Michael.Jones@richmondgov.com>  
**Cc:** Bennett, Chelsi H. - CAO <Chelsi.Bennett@richmondgov.com>; Eleazer R. Carter <eleazercarter@aol.com>; Saunders, Lincoln - Mayor's Office <Lincoln.Saunders@richmondgov.com>; Addison, Andreas D. - City Council <Andreas.Addison@richmondgov.com>; Bieber, Craig K. - City Council Office <Craig.Bieber@richmondgov.com>; Hilbert, Chris A. - City Council <Chris.Hilbert@richmondgov.com>; Townes, Lisa F. - City Council Office <Lisa.Townes@richmondgov.com>; Larson, Kristen N. - City Council <Kristen.Larson@richmondgov.com>; Lyle, Bryce H. - City Council Office <Bryce.Lyle@richmondgov.com>; Robins, Amy E. - City Council Office <Amy.Robins@richmondgov.com>; Robertson, Ellen F. - City Council <Ellen.Robertson@richmondgov.com>; Stokes, Kiya A. - City Council Office <Kiya.Stokes@richmondgov.com>; Newbille, Cynthia I. - City Council <Cynthia.Newbille@Richmondgov.com>; Patterson, Samuel - City Council Office <Samuel.Patterson@richmondgov.com>; Trammell, Reva M. - City Council <Reva.Trammell@Richmondgov.com>; Bishop, Richard K. - City Council Office <Richard.Bishop@richmondgov.com>; Jackson, Allen L. - City Attorney <Allen.L.Jackson@Richmondgov.com>; D'Arcy, Beth H. - CAO <Beth.Darcy@RichmondGov.com>; mjohnson <mjohnson@lfkdllaw.com>; hr <hr@metrohealthems.com>; mcgruder <mcgruder@metrohealthems.com>; Cuffee-Glenn, Selena - CAO <Selena.Cuffee-Glenn@richmondgov.com>; Drewry, Laura K. - City Attorney <Laura.Drewry@richmondgov.com>; Agelasto, Parker C. - City Council <Parker.Agelasto@richmondgov.com>; Carter, Melvin D. - Fire <Melvin.Carter@richmondgov.com>  
**Subject:** Re: August 7, 2018 Lobby Meeting ( In Re: Western Star Hospital Authority d/b/a/ Metro Health EMS ) Requests for Franchise or Permit  
**Date:** Thu, Aug 16, 2018 11:56 pm

Dear Chelsi,

Thanks for the update! I'm glad to know that this is moving forward.

Just to be clear- no one has requested any exceptions to the "process" from me as an elected official. The only request/questions I received pertained to what the process and timeline for obtaining a franchise permit is. Further, it would have been impossible to circumvent a "process" that was nonexistent. I'm don't assume that I am the elected official referenced in the previous email but I feel it's important to be clear about my involvement since I have been making inquiries about this.

All the best,

Kim

Sent from my iPhone

On Aug 13, 2018, at 10:01 PM, Jones, Michael J. - City Council <[Michael.Jones@richmondgov.com](mailto:Michael.Jones@richmondgov.com)> wrote:

Please remove me from this string of emails

Thank You.

Michael Jones

Sent from my iPhone

On Aug 13, 2018, at 8:25 PM, Bennett, Chelsi H. - CAO <[Chelsi.Bennett@richmondgov.com](mailto:Chelsi.Bennett@richmondgov.com)> wrote:

Good Day Eleazer-

For the record, several statements asserted as fact in your letter are a misstatement of our conversation and the situation at hand.

From: B. Lamont Doyle <bdoyle@metrohealthems.com>

To: 'Gray, Kimberly B. - City Council' <Kimberly.Gray@richmondgov.com>; 'Bennett, Chelsi H. - CAO' <Chelsi.Bennett@richmondgov.com>

Cc: 'Agelasto, Parker C. - City Council' <Parker.Agelasto@richmondgov.com>; 'Saunders, Lincoln - Mayor's Office' <Lincoln.Saunders@richmondgov.com>; 'Addison, Andreas D. - City Council' <Andreas.Addison@richmondgov.com>; 'Bieber, Craig K. - City Council Office' <Craig.Bieber@richmondgov.com>; 'Hilbert, Chris A. - City Council' <Chris.Hilbert@richmondgov.com>; 'Townes, Lisa F. - City Council Office' <Lisa.Townes@richmondgov.com>; 'Larson, Kristen N. - City Council' <Kristen.Larson@richmondgov.com>; 'Lyle, Bryce H. - City Council Office' <Bryce.Lyle@richmondgov.com>; 'Robins, Amy E. - City Council Office' <Amy.Robins@richmondgov.com>; 'Robertson, Ellen F. - City Council' <Ellen.Robertson@richmondgov.com>; 'Stokes, Kiya A. - City Council Office' <Kiya.Stokes@richmondgov.com>; 'Newbille, Cynthia I. - City Council' <Cynthia.Newbille@Richmondgov.com>; 'Patterson, Samuel - City Council Office' <Samuel.Patterson@richmondgov.com>; 'Trammell, Reva M. - City Council' <Reva.Trammell@Richmondgov.com>; 'Bishop, Richard K. - City Council Office' <Richard.Bishop@richmondgov.com>; 'Jones, Michael J. - City Council' <Michael.Jones@richmondgov.com>; 'Jackson, Allen L. - City Attorney' <Allen.L.Jackson@Richmondgov.com>; 'D'Arcy, Beth H. - CAO' <Beth.Darcy@RichmondGov.com>; eleazercarter <eleazercarter@aol.com>; mjohnson <mjohnson@lfdlaw.com>; hr <hr@metrohealthems.com>; rmcgruder <rmcgruder@metrohealthems.com>; 'Cuffee-Glenn, Selena - CAO' <Selena.Cuffee-Glenn@richmondgov.com>; 'Drewry, Laura K. - City Attorney' <Laura.Drewry@richmondgov.com>

Subject: RE: Franchise / Permit for Ambulance Transportation Metro Health EMS

Date: Mon, Aug 13, 2018 2:57 pm

Good Afternoon to ALL:

Mr. Jackson, or Any Other Member of Authority

Who has the authority to provide the simple letter I am requesting? Does the council have the authority of a group or individually? Does the Mayor have a single authority? Does the CAO office has a single authority? Who has the authority??

Metro understands that they may be a delay for a franchise/permit. We are not asking for that at this time, we understand Ms. Bennett needs until the 15<sup>th</sup> of August to prepare "new" policy for this ordinance. We are asking for a simple letter(see below).

[ Date Letter]

***"To Whom It May Concern:***

***The City of Richmond is fully aware that Western-Star Hospital Authority Inc., d/b/a Metro Health EMS, Inc is traveling to and from the VA Hospital inside the City of Richmond to service the United States Veteran Affairs Hospital. "***

***Sincerely,  
The city of Richmond.***

Can anyone or does anyone know who has the authority? We are asking for a simple request a letter. We have respected the City's Authority of such ordinance without a policy. I am not clear if anyone knows within the city who has this authority.



Respectfully submitted,

B. Lamont Doyle, EMT-P, RN  
Chief Operating Officer  
Western-Star Hospital Authority Inc.  
Metro Health EMS

*"The Driving Force In Healthcare"*

844.937.6660 Ext 708 (Bus)  
404.201.2159 Fax

1.844.992.4500 (Emergency/non-Emergency transport)

Headquarter:

1145 Hightower Trail  
2<sup>nd</sup> Floor  
Atlanta, Georgia 30350

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**From:** Gray, Kimberly B. - City Council <[Kimberly.Gray@richmondgov.com](mailto:Kimberly.Gray@richmondgov.com)>  
**Sent:** Saturday, August 11, 2018 9:11 AM  
**To:** Bennett, Chelsi H. - CAO <[Chelsi.Bennett@richmondgov.com](mailto:Chelsi.Bennett@richmondgov.com)>  
**Cc:** Agelasto, Parker C. - City Council <[Parker.Agelasto@richmondgov.com](mailto:Parker.Agelasto@richmondgov.com)>; B. Lamont Doyle <[bdoyle@metrohealthems.com](mailto:bdoyle@metrohealthems.com)>; Saunders, Lincoln - Mayor's Office <[Lincoln.Saunders@richmondgov.com](mailto:Lincoln.Saunders@richmondgov.com)>; Addison, Andreas D. - City Council <[Andreas.Addison@richmondgov.com](mailto:Andreas.Addison@richmondgov.com)>; Bieber, Craig K. - City Council Office <[Craig.Bieber@richmondgov.com](mailto:Craig.Bieber@richmondgov.com)>; Hilbert, Chris A. - City Council <[Chris.Hilbert@richmondgov.com](mailto:Chris.Hilbert@richmondgov.com)>; Townes, Lisa F. - City Council Office <[Lisa.Townes@richmondgov.com](mailto:Lisa.Townes@richmondgov.com)>; Larson, Kristen N. - City Council <[Kristen.Larson@richmondgov.com](mailto:Kristen.Larson@richmondgov.com)>; Lyle, Bryce H. - City Council Office <[Bryce.Lyle@richmondgov.com](mailto:Bryce.Lyle@richmondgov.com)>; Robins, Amy E. - City Council Office <[Amy.Robins@richmondgov.com](mailto:Amy.Robins@richmondgov.com)>; Robertson, Ellen F. - City Council <[Ellen.Robertson@richmondgov.com](mailto:Ellen.Robertson@richmondgov.com)>; Stokes, Kiya A. - City Council Office <[Kiya.Stokes@richmondgov.com](mailto:Kiya.Stokes@richmondgov.com)>; Newbille, Cynthia I. - City Council <[Cynthia.Newbille@Richmondgov.com](mailto:Cynthia.Newbille@Richmondgov.com)>; Patterson, Samuel - City Council Office <[Samuel.Patterson@richmondgov.com](mailto:Samuel.Patterson@richmondgov.com)>; Trammell, Reva M. - City Council <[Reva.Trammell@Richmondgov.com](mailto:Reva.Trammell@Richmondgov.com)>; Bishop, Richard K. - City Council Office <[Richard.Bishop@richmondgov.com](mailto:Richard.Bishop@richmondgov.com)>; Jones, Michael J. - City Council <[Michael.Jones@richmondgov.com](mailto:Michael.Jones@richmondgov.com)>; Jackson, Allen L. - City Attorney <[Allen.L.Jackson@Richmondgov.com](mailto:Allen.L.Jackson@Richmondgov.com)>; D'Arcy, Beth H. - CAO <[Beth.Darcy@RichmondGov.com](mailto:Beth.Darcy@RichmondGov.com)>; [eleazercarter@aol.com](mailto:eleazercarter@aol.com); [mjohnson@lfkdlaw.com](mailto:mjohnson@lfkdlaw.com); [hr@metrohealthems.com](mailto:hr@metrohealthems.com); [rmcgruder@metrohealthems.com](mailto:rmcgruder@metrohealthems.com); Cuffee-Glenn, Selena - CAO <[Selena.Cuffee-Glenn@richmondgov.com](mailto:Selena.Cuffee-Glenn@richmondgov.com)>; Drewry, Laura K. - City Attorney <[Laura.Drewry@richmondgov.com](mailto:Laura.Drewry@richmondgov.com)>  
**Subject:** Re: Franchise / Permit for Ambulance Transportation Metro Health EMS

Any updates?

Sent from my iPhone

On Aug 7, 2018, at 1:07 PM, Gray, Kimberly B. - City Council <[Kimberly.Gray@richmondgov.com](mailto:Kimberly.Gray@richmondgov.com)> wrote:

Hello Chelsi and All,

Recognizing that time is of the essence for those making requests, it would be helpful to know when the criteria will be established and once established how long the review process is expected to take.

I'm hoping that if the respective requesting entities meet the stated requirements we can move forward with an ordinance at our first meeting in September.

Best,

Kim

Sent from my iPhone

On Aug 7, 2018, at 9:51 AM, Bennett, Chelsi H. - CAO <[Chelsi.Bennett@richmondgov.com](mailto:Chelsi.Bennett@richmondgov.com)> wrote:

Good Morning Councilwoman Gray-

We are in the process of developing our criteria and process. We will keep everyone posted on next steps including a timeline.

chb

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**Chelsi Bennett, J.D.**

*Senior Policy Advisor to the CAO*

*Office of the Chief Administrative Officer*

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**From:** Gray, Kimberly B. - City Council

**Sent:** Monday, August 6, 2018 6:31 PM

**To:** Bennett, Chelsi H. - CAO

**Cc:** Agelasto, Parker C. - City Council; B. Lamont Doyle; Saunders, Lincoln - Mayor's Office; Addison, Andreas D. - City Council; Bieber, Craig K. - City Council Office; Hilbert, Chris A. - City Council; Townes, Lisa F. - City Council Office; Larson, Kristen N. - City Council; Lyle, Bryce H. - City Council Office; Robins, Amy E. - City Council Office; Robertson, Ellen F. - City Council; Stokes, Kiya A. - City Council Office; Newbille, Cynthia I. - City Council; Patterson, Samuel - City Council Office; Trammell, Reva M. - City Council; Bishop, Richard K. - City Council Office; Jones, Michael J. - City Council; Jackson, Allen L. - City Attorney; D'Arcy, Beth H. - CAO; [eleazercarter@aol.com](mailto:eleazercarter@aol.com); [mjohnson@lfdlaw.com](mailto:mjohnson@lfdlaw.com); [hr@metrohealthems.com](mailto:hr@metrohealthems.com); [rmcgruder@metrohealthems.com](mailto:rmcgruder@metrohealthems.com); Cuffee-Glenn, Selena - CAO; Ashley, Bonnie M. - City Attorney

**Subject:** Re: Franchise / Permit for Ambulance Transportation Metro Health EMS

Are you still planning to introduce an ordinance at the September 10th Council Meeting?

Sent from my iPhone

On Aug 6, 2018, at 5:30 PM, Bennett, Chelsi H. - CAO <[Chelsi.Bennett@richmondgov.com](mailto:Chelsi.Bennett@richmondgov.com)> wrote:

Good Afternoon Councilman Agelasto-

We will you posted.

chb

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**Chelsi Bennett, J.D.***Senior Policy Advisor to the CAO**Office of the Chief Administrative Officer*

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**From:** Agelasto, Parker C. - City Council**Sent:** Thursday, August 2, 2018 2:53 PM**To:** Bennett, Chelsi H. - CAO**Cc:** Gray, Kimberly B. - City Council; B. Lamont Doyle; Saunders, Lincoln - Mayor's Office; Addison, Andreas D. - City Council; Bieber, Craig K. - City Council Office; Hilbert, Chris A. - City Council; Townes, Lisa F. - City Council Office; Larson, Kristen N. - City Council; Lyle, Bryce H. - City Council Office; Robins, Amy E. - City Council Office; Robertson, Ellen F. - City Council; Stokes, Kiya A. - City Council Office; Newbille, Cynthia I. - City Council; Patterson, Samuel - City Council Office; Trammell, Reva M. - City Council; Bishop, Richard K. - City Council Office; Jones, Michael J. - City Council; Jackson, Allen L. - City Attorney; D'Arcy, Beth H. - CAO; [eleazercarter@aol.com](mailto:eleazercarter@aol.com); [mjohnson@lfkdllaw.com](mailto:mjohnson@lfkdllaw.com); [hr@metrohealthems.com](mailto:hr@metrohealthems.com); [rmcgruder@metrohealthems.com](mailto:rmcgruder@metrohealthems.com); Cuffee-Glenn, Selena - CAO; Ashley, Bonnie M. - City Attorney**Subject:** Re: Franchise / Permit for Ambulance Transportation Metro Health EMS

Chelsi,

Thank you for explaining the situation. Can you please keep Council members informed as the criteria are developed. Should Council action be required on an ordinance, information along the way will keep us educated to ultimately act on legislation.

Sincerely,

Parker C. Agelasto

Richmond City Council, 5th District

On Jul 31, 2018, at 5:44 PM, Bennett, Chelsi H. - CAO

<[Chelsi.Bennett@richmondgov.com](mailto:Chelsi.Bennett@richmondgov.com)> wrote:

Good Day Councilwoman Gray-

City Administration has been working with all interested parties requesting a franchise/permit including Metro Health EMS.

This is a very sensitive item and we continue to work with the City Attorney's Office and the appropriate City department to develop criteria and policies regarding this matter. For your information, Lamont Doyle and his team have threatened to sue the City (see attachment). Once again, the Administration's goal is to develop criteria and go through the proper process to allow equal and equitable access to all requestors.

Here is some background on this matter:

Lamont Doyle and another team member visited our office twice in late June to request a franchise/permit to operate his ambulance service in the City limits. He stated that he need authorization to operate within the City limits according to City Code Sec. 10 -78:



Operation of Vehicles Not Holding City Franchise or Permit. During his second visit, I shared that we were working with the City Attorney's Office to be able to respond to his request. I also shared that based on the code section and an ordinance being required that the earliest Council action would likely be in September. He demanded action (ordinance/letter) for his VA contract before he returned to Atlanta the following day. I reiterated that it would take longer than one day to continue our research and provide next steps.

During his in-person visit and via phone, I shared that the City Attorney's Office was researching the request.

Through our preliminary research we learned that there had not been an ordinance requesting a franchise/permit in recent years.

Thus, after consultation with the City Attorney's Office, it was determined that the Administration should develop criteria and/or an application for parties interested in requesting a franchise/permit in Richmond. This criteria will be used by the Administration for franchise/permit requests to the City.

Lamont is requesting a franchise/permit to obtain a government contract and there are other interested parties competing who are also requesting the same action from the City of Richmond.

At this present time the Administration has received a request for a franchise/permit from another entity that seems to be competing for the same VA contract that Western Star Hospital references.

I have emailed Lamont and other interested parties that we are updating our criteria and will be in touch with additional information regarding the introduction of an ordinance.

The ordinances can come by request from the Mayor. The criteria will be applied to all requestors and the Administration will be available to share comments based on the criteria (public health, safety, and general welfare requirements). The final action to grant an additional permit/franchise in Richmond is decided via ordinance by Council.

My goal is to have updated criteria for equal and equitable review to all requestors by mid-August. I will provide this information to each requestor and their legal counsel. We are still awaiting the name of Western Star Hospital's Virginia legal representative for future correspondences.

chb

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**Chelsi Bennett**

*Senior Policy Advisor to the CAO*

*Office of the Chief Administrative Officer*

**From:** Gray, Kimberly B. - City Council  
**Sent:** Saturday, July 28, 2018 9:41 AM  
**To:** B. Lamont Doyle <[bdoyle@metrohealthems.com](mailto:bdoyle@metrohealthems.com)>  
**Cc:** Saunders, Lincoln - Mayor's Office  
<[Lincoln.Saunders@richmondgov.com](mailto:Lincoln.Saunders@richmondgov.com)>; Addison, Andreas D. - City Council <[Andreas.Addison@richmondgov.com](mailto:Andreas.Addison@richmondgov.com)>; Bieber, Craig K. - City Council Office <[Craig.Bieber@richmondgov.com](mailto:Craig.Bieber@richmondgov.com)>; Hilbert, Chris A. - City Council <[Chris.Hilbert@richmondgov.com](mailto:Chris.Hilbert@richmondgov.com)>; Townes, Lisa F. - City Council Office <[Lisa.Townes@richmondgov.com](mailto:Lisa.Townes@richmondgov.com)>; Larson, Kristen N. - City Council <[Kristen.Larson@richmondgov.com](mailto:Kristen.Larson@richmondgov.com)>; Lyle, Bryce H. - City Council Office <[Bryce.Lyle@richmondgov.com](mailto:Bryce.Lyle@richmondgov.com)>; Agelasto, Parker C. - City Council <[Parker.Agelasto@richmondgov.com](mailto:Parker.Agelasto@richmondgov.com)>; Robins, Amy E. - City Council Office <[Amy.Robins@richmondgov.com](mailto:Amy.Robins@richmondgov.com)>; Robertson, Ellen F. - City Council <[Ellen.Robertson@richmondgov.com](mailto:Ellen.Robertson@richmondgov.com)>; Stokes, Kiya A. - City Council Office <[Kiya.Stokes@richmondgov.com](mailto:Kiya.Stokes@richmondgov.com)>; Newbille, Cynthia I. - City Council <[Cynthia.Newbille@Richmondgov.com](mailto:Cynthia.Newbille@Richmondgov.com)>; Patterson, Samuel - City Council Office <[Samuel.Patterson@richmondgov.com](mailto:Samuel.Patterson@richmondgov.com)>; Trammell, Reva M. - City Council <[Reva.Trammell@Richmondgov.com](mailto:Reva.Trammell@Richmondgov.com)>; Bishop, Richard K. - City Council Office <[Richard.Bishop@richmondgov.com](mailto:Richard.Bishop@richmondgov.com)>; Jones, Michael J. - City Council <[Michael.Jones@richmondgov.com](mailto:Michael.Jones@richmondgov.com)>; [hope.elliott@richmondgov.com](mailto:hope.elliott@richmondgov.com); Bennett, Chelsi H. - CAO <[Chelsi.Bennett@richmondgov.com](mailto:Chelsi.Bennett@richmondgov.com)>; [selena.glenn@richmondgov.com](mailto:selena.glenn@richmondgov.com); Jackson, Allen L. - City Attorney <[Allen.L.Jackson@Richmondgov.com](mailto:Allen.L.Jackson@Richmondgov.com)>; D'Arcy, Beth H. - CAO <[Beth.Darcy@RichmondGov.com](mailto:Beth.Darcy@RichmondGov.com)>; [eleazercarter@aol.com](mailto:eleazercarter@aol.com); [mjohnson@lfkdlaw.com](mailto:mjohnson@lfkdlaw.com); [hr@metrohealthems.com](mailto:hr@metrohealthems.com); [rmcgruder@metrohealthems.com](mailto:rmcgruder@metrohealthems.com)  
**Subject:** Re: Franchise / Permit for Ambulance Transportation Metro Health EMS

Can anyone please let me know where this is in the process and how much longer this is expected to take?

Kim

Sent from my iPhone

On Jul 25, 2018, at 4:43 PM, B. Lamont Doyle  
<[bdoyle@metrohealthems.com](mailto:bdoyle@metrohealthems.com)> wrote:

Ladies and Gentlemen,

Please receive the attachment regarding the City of Richmond ambulance Franchise or Permit.

If you should have any questions please feel free to contact me at the number

listed below or Mr. Eleazer R. Carter at  
803-435-0550

Respectfully submitted,

B. Lamont Doyle, EMT-P, RN  
Chief Operating Officer  
Western-Star Hospital Authority Inc.  
Metro Health EMS

*"The Driving Force In Healthcare"*

844.937.6660 Ext 708 (Bus)  
404.201.2159 Fax

1.844.992.4500 (Emergency/non-  
Emergency transport)

Headquarter:

1145 Hightower Trail  
2<sup>nd</sup> Floor  
Atlanta, Georgia 30350

<City of Richmond 1.pdf>

<Western Star Hospital Email - File Suit.pdf>



**THE CARTER LAW FIRM***105 South Brooks Street**P.O. Box 187**Manning, South Carolina 29102**Tel. (803) 435-0550**Fax (803) 435-0551***Reply To:****Manning Office****Eleazer R. Carter**  
  
\_\_\_\_\_

August 9, 2018

Attorney Chelsi Bennett  
City Hall of Richmond,  
Office of Chief Administrative Officer  
900 Broad Street, Suite 201  
Richmond, Virginia 23220

Re Western Star Hospital Authority d/b/a Metro Health EMS  
Request for "Franchise or Permit"

Dear Attorney Bennett:

Thank you for stopping in your office lobby and speaking with me on Tuesday, August 7, 2018, even after informing me of your busy schedule. And yes, I do understand the need to schedule an appointments to speak with you in the future. At that time I informed you that I was only going to be in town for that day and would appreciate you granting me a few minutes of your time. During our conversation you informed me that you and your staff, in conjunction with the city's legal department, "were developing new criteria for issuing the 'Franchise or Permits'" to operate and/or transport patients in ambulances there within the city limits. Also, I attempted to inquire about the past practices of the city for the issuing and obtaining a "Franchise and Permit". You informed me that the former employee had created several informal procedures for enforcing the ambulance ordinances and after that employee separated from the city those procedures were lost and/or discontinued. You also stated that no entity or other person had requested a "Franchise or Permit" after that employee left until the time of Western Star Hospital Authority, hereinafter, Metro Health EMS, and/or another entity. You informed me that it was Metro health EMS's request that caused you and/or other city officials to realize that the city did not have, nor maintained an appropriate procedure and/or criteria for applying for a "Franchise or Permit". When I inquired further of the expected time for you all to develop and complete those new procedures or criteria you indicated that you did not know when you would have these procedures developed. You stated that you were meeting with the city legal office later on in that day to discuss them. Further, you informed me that it continues to be possible that the new procedures for applying may not be readily available even for the September 2018 city council meeting. I became quite concerned, but I did not share my concern because of your heightened vocal tones. And as to that matter, again, I apologize for asking you to calm down in your words.

I again shared with you that Metro Health EMS's patients would only be Federal patients. While we are certified for Advance Life Support transportation, the overwhelmingly majority of our patients will be Basic Life Support transportations. Again, they will all be Federal patients' transportation. I further inquired about your local State Hospital transportations and if they are operating with the local ordinances' Franchise or Permit. You were not able to fully address that inquiry.

Thereafter, I attempted to discuss the local ordinances versus its application to the Federal supremacy clause. Lastly, I tried to discuss ex post facto application of the proposed newly created criteria, if any. You stated that it was your position that none of that would impact the City of Richmond's ordinances

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*"You must be the change you wish to see in the world" .....Mahatma Gandhi*

Letter to Ms. C. Bennett  
Page Two (2)  
August 9, 2018

Nor your proposed new criteria. As you should recall I had a different position, but did not contest your opinion.

Ms. Bennett, the real purpose of this letter is to confirm our discussion and the prior conversation(s) that you, your office and/or other municipal officials had with Mr. B. Lamont Doyle, COO for Metro Health EMS, regarding the right to transport Federal patients. Metro Health EMS wants to make the record clear that we are only attempting to respect the city codes of Richmond, Virginia by requesting the "Franchise or Permit", and that we wanted to do the same without compromise to Metro Health's legal and contractual rights and obligations. Metro Health EMS now wants the City to know that every day that passes, Metro Health EMS suffers an extreme financial and economical harm due to the lack of standards for acting upon and enforcing the city's EMS transportation ordinances. Therefore, we are again requesting that the City provide us with a temporary statement or a letter waiving enforcement of the pertinent ordinances due to Metro Health EMS intent to pick up and transport Federal patients only. After you and the city have developed the new proposed criteria, we can all again revisit its application to Metro Health EMS and all others, if any, similarly situated.

Again, thank you in advance for your attention to this matter and this letter. By copy of the same, I am forwarding this letter to the appropriate city officials.

Sincerely,



Eleazer R. Carter

ERC/

Cc: Mayor and Council  
Allen Jackson, Esquire  
Mr. B. Lamont Doyle, COO



Moreover, I will not continue to go back and forth with these correspondences.

Let's focus on the issue at hand - your desire to obtain an ambulance franchise/permit from the City of Richmond.

The City has been responsive to you, Lamont Doyle, and other members of WSH. The City is developing an application and criteria for an equitable and consistent process, as shared with you and your client.

It has been shared several times with you and your staff that the Administration is not legally allowed to create a letter for you or any other requester for a matter that has to be voted on by City Council. The granting of a permit/franchise is done by the Richmond City Council. Again, even you and your client have shared the need for an ordinance from your reading of the City Code Section 10-79. Unfortunately, your rebuttals shift when a position you present has not caused the City to bypass its Code for a criteria, application, and process.

The City Administration is aware of your outreach to elected officials asking for an exception to the process and/or for it to be expedited. We have also been advised by City staff that you/your client has reached out for exceptions to the City Code Section 10-79. Reaching out to influence City staff is inappropriate – there is no need to circumvent the system because protocol will be followed.

Beginning Friday, August 17th, the Richmond Fire Department's webpage will have available the City's Ambulance Franchise/Permit application.

It is the responsibility of the requestor to submit a completed application at least 30 days before the desired City Council introduction date to the Richmond Fire Department. Complete applications will take at a minimum of five business days to review for completion by the Richmond Fire Department. A completed application will be processed, submitted for an ordinance drafting, and then introduced at the next Council meeting. Once an ordinance is introduced, the requestor is responsible for tracking the paper through the City's legislative process (committee hearing and full Council hearing).

The Richmond Fire Department will be the primary contact and can answer questions about the criteria, application, and process.

I hope this email provides clarity on the issues at hand, accuracy on how the City Code will be followed and implemented, and a timeline for next steps.

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**Chelsi Bennett, J.D.**

*Senior Policy Advisor to the CAO  
Office of the Chief Administrative Officer*

**From:** Eleazer R. Carter [<mailto:eleazercarter@aol.com>]

**Sent:** Friday, August 10, 2018 3:16 PM

**To:** Bennett, Chelsi H. - CAO

**Cc:** Gray, Kimberly B. - City Council; [Agelasto@richmondgov.com](mailto:Agelasto@richmondgov.com); Saunders, Lincoln - Mayor's Office; Addison, Andreas D. - City Council; Bieber, Craig K. - City Council Office; Hilbert, Chris A. - City Council; Townes, Lisa F. - City Council Office; Larson, Kristen N. - City Council; Lyle, Bryce H. - City Council Office; Robins, Amy E. - City Council Office; Robertson, Ellen F. - City Council;



Re: August 7, 2018 Lobby Meeting ( In Re: Western Star Hospital Authority d/b/a/ Metro Health EMS ) Requests for Franchise or Permit  
Stokes, Kiya A. - City Council Office; Newbille, Cynthia I. - City Council; Patterson, Samuel - City Council Office; Trammell, Reva M. - City Council; Bishop, Richard K. - City Council Office; Jones, Michael J. - City Council; Jackson, Allen L. - City Attorney; D'Arcy, Beth H. - CAO;  
[mjohnson@lfkdlaw.com](mailto:mjohnson@lfkdlaw.com); [hr@metrohealthems.com](mailto:hr@metrohealthems.com); [mcgruder@metrohealthems.com](mailto:mcgruder@metrohealthems.com); Cuffee-Glenn, Selena - CAO; Drewry, Laura K. - City Attorney  
**Subject:** August 7, 2018 Lobby Meeting ( In Re: Western Star Hospital Authority d/b/a/ Metro Health EMS ) Requests for Franchise or Permit

Attorney Bennett:  
Please find the attached Letter.